

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
: :
- v. - : 20-CR-412 (AT)
: :
TIMOTHY SHEA, :
: :
Defendant. :
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PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, all pleadings previously filed, and proceedings heretofore had, Timothy Shea, by his attorney John Meringolo, Esq., will move before the Honorable Analisa Torres, United States District Judge for the Southern District of New York, at a date and time set by the Court at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order:

- (1) Disqualifying AUSA Robert Sobelman from the prosecution team at the October trial;
- (2) Instructing the Government to provide an explanation for its devious substitution of GX20 during the May-June trial;
- (3) Instructing the Government to provide an explanation for the late disclosure of the Shea Acer Laptop Image; and
- (4) Granting such other and further relief as the Court deems just and proper.

Dated: August 22, 2022
New York, NY

/s/ _____
John Meringolo, Esq.
Meringolo & Associates, P.C.
375 Greenwich Street, 7th Floor
New York, NY 10013
(212) 941-2077
(212) 202-4936 fax
Attorney for Defendant Timothy Shea

To: AUSA Mollie Bracewell
AUSA Robert Sobelman
AUSA Derek Wikstrom